
PRIVACY NOTICE FOR JOB APPLICANTS

Data controller:

The following companies operating as part of Lupin Europe are deemed to be data controllers:

Hormosan Pharma GmbH, Hanauer Landstraße 139-143, 60314 Frankfurt am Main, Germany

Lupin Atlantis Holdings SA, Landis+Gyr Strasse 1, 6300 Zug, Switzerland

Lupin Europe GmbH, Hanauer Landstraße 139-143, 60314 Frankfurt am Main, Germany

Lupin Healthcare (UK) Ltd, The Urban Building, Second Floor 3-9 Albert Street, Slough, Berkshire, SL1 2BE, United Kingdom

Nanomi BV, Zutphenstraat 51, 7575 EJ Oldenzaal, The Netherlands

Each company listed above is referred to as “Company” below.

1. Introduction

The Company is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you.

During the recruitment process, the Company collects and processes personal data relating to job applicants.

The Company is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

2. Data Protection requirements

The Company will comply with data protection law. This means that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way;
- b) Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- c) Relevant to the purposes we have told you about and limited to those purposes only;
- d) Accurate and kept up to date;
- e) Kept only for such time as is necessary for the purposes we have told you about; and
- f) Kept securely.

3. What personal information does the Company collect and process?

The Company collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This may include:

- a) Personal contact details, such as your name, title, address and contact details, including email address and telephone number;
- b) application documents such as CV, references, certificates
- c) details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;
- d) lawful selection testing data where requested; which results shall only be interpreted by those qualified to do so;
- e) information about your remuneration, including entitlement to benefits such as pensions;

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- f) information about your nationality and entitlement to work in the country;

We may also collect the following special categories of more sensitive personal information:

- a) information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments, in accordance with local labour law
- b) information about your criminal record; and
- c) equal opportunities monitoring information, including information about your health and religion or belief.

The Company collects this information in a variety of ways during the application and recruitment process.

In some cases, the Company collects personal data about you from third parties in accordance with local labour law, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Data is stored in a range of different places, including on your application record, in the Company's HR systems and in other IT systems (including the Company's email system).

4. Why does the Company process personal data and under what situations?

The Company needs to process data prior to entering into a contract with you. We also need to process data to enter into an employment contract with you and to meet its obligations under that employment contract.

In addition, the Company needs to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the country. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake a particular role. The Company processes health information if we need to make reasonable adjustments to the recruitment process for candidates with a disability.

The Company has a legitimate interest in processing personal data during the recruitment process and in keeping records of that process. Processing such data from job applicants enables the Company to manage the recruitment process, assess the suitability of candidates and make informed decisions as to whom we wish to recruit. The Company may also have to process data from job applicants in order to defend legal claims.

5. If you fail to provide personal information

You are under no obligation to provide the Company with personal data during the recruitment process. However, if you do not provide certain personal information when requested, the Company may not be able to process your application for employment properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for you if this information is not provided.

6. Automated decision-making

Our employment decisions are not based solely on automated decision-making.

7. For how long do you keep personal data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. If your application for employment is unsuccessful, the

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company will destroy your data unless you specifically consent for your data to be kept for a longer specified period in order to be considered for any other suitable position within a twelve (12) month period.

If your application for employment is successful, personal data gathered during the new recruitment process will be transferred to your personnel file and we shall inform you through a new privacy notice which sets down the details of how we process your data in an employment relationship including the periods for which your data shall be held.

8. Who has access to personal data?

Your information will be shared internally for the purposes of the recruitment process, including with members of the HR team and interviewers.

The Company will not share your data with third parties unless you accept an offer of employment. In those circumstances, the Company shall share your data with third parties where required by law and where it is necessary in order to administer the employment relationship with you or where we have another legitimate interest in doing so.

Your data may be transferred to countries outside the European Economic Area (EEA) in order to administer employment benefits, effect compensation payments, make recommendations on compensation and promotions.

Data is transferred outside the EEA on the basis of data processing agreements, EU standard contractual clauses and other safeguards.

9. How does the company protect personal data?

The Company takes the security of our data seriously. The Company has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

When the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of data.

10. Your rights

As a data subject, you have a number of rights. You can:

- a) access and obtain a copy of your data on request (known as a “data subject access request”);
- b) require the Company to change incorrect or incomplete data;
- c) request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- d) object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- e) ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it, and
- f) Lodging a complaint with a supervisory authority

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact your HR Manager or the relevant Data Protection Officer.

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11. Complaints

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to:

Country	Supervisory Authority	Website link	Address Details	Contact Details
UK	Information Commissioner's Office	https://ico.org.uk/	Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF	+44 (0) 303 123 1113
Germany (Hesse)	The Hessian Data Protection Officer	https://datenschutz.hessen.de/	The Hessian Data Protection Officer PO Box 3163 65021 Wiesbaden	+49 (0) 611 1408 144
Netherlands	Dutch Data Protection Authority	https://autoriteitpersoonsgegevens.nl/nl	Authority Personal Data PO Box 93374 2509 AJ DEN HAAG	+31 (0)70 888 85 00
Switzerland	Federal Data Protection and Information Commissioner	https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html	Office of the Federal Data Protection and Information Commissioner FDPIC Feldeggweg 1 CH - 3003 Berne	+41 (0)58 462 43 95

12. How you can get in contact with the relevant Data Protection Officer?

<i>For Hormosan Pharma GmbH, Lupin Atlantis Holdings SA, Nanomi BV, Lupin Healthcare (UK) Ltd, Lupin Europe GmbH</i>
The Data Protection Officer
Dr. Karsten Kinast, LL.M.
KINAST Rechtsanwaltsgesellschaft mbH Hohenzollernring 54, D-50672 Köln, Germany
Email: dpo-eu@lupin.com
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13. Updating our privacy notice

Constant technological development makes it necessary to adapt our privacy notice from time to time. We reserve the right to change this privacy notice at any time with effect for the future. If we change our privacy notice, we will inform you of this by appropriate means.

Version Control

Date	Version	Description of Changes	Changed by	Approved by
28/08/18	1.1	Insertion of 3 d) Lawful selection....	ME Matthews	K Allam
17/06/20	1.2	Change of DPO contact details	N. Dietrich	K Allam

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